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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CHARMAINE BUTKOWSKI, an individual;

Plaintiff,

v.

BLUESTEM BRANDS, INC., d/b/a
FINGERHUT, a foreign corporation;
NAVIENT SOLUTIONS, INC., a foreign
corporation; EQUIFAX, INC., a foreign
corporation;

Defendants.

Case No.: 2:16-cv-02220-JAD-GWF

**JOINT MOTION AND ORDER TO
EXTEND TIME FOR DISMISSAL OF
DEFENDANT BLUESTEM BRANDS,
INC.**

(Third Request)

Plaintiff, Charmaine Butkowski (“Plaintiff”) and Bluestem Brands, Inc. (“Bluestem”) (the “Parties”), under Fed. R. Civ. P. 6(b)(1)(a) and Local Rule IA 6-1, hereby move this Court for the entry of an Order extending the time for Plaintiff and Bluestem to review and execute settlement documents and for the Parties to prepare dismissal documents. In support of this Motion, the Parties refer the Court to the memorandum below:

MEMORANDUM OF POINTS AND AUTHORITIES

Rule 6(b)(1)(a) of the Federal Rules of Civil Procedure and Local Rule IA 6-1 provide that the Court may, for good cause, extend the time with or without motion or notice if the Court acts, or if a request is made, before the original time or its extension expires.

The Parties respectfully request an extension of time during which Plaintiff will review and sign the proposed settlement agreement and release with Bluestem. The Parties make this request in good faith and have good cause for the relief they seek. Plaintiff has been unable to review and execute the agreement due to ongoing health issues.

1 Based on the foregoing, Plaintiff respectfully requests that this Court enter an Order
2 allowing them and additional thirty (30) days, through and including July 19, 2017, to allow for
3 Plaintiff to recover and review the settlement documents, for the Parties to execute the settlement
4 documents, and for the Parties to prepare dismissal documents. If the Parties have not submitted
5 dismissal documents to the Court before July 19, 2017, they shall submit a joint status report by
6 the same date.

7 Respectfully submitted.

8 Dated: June 19, 2017

Dated: June 19, 2017

9 **LAW OFFICE OF**
10 **KEVIN L. HERNANDEZ**

BALLARD SPAHR LLP

11 /s/ Kevin L. Hernandez
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16 *Attorneys for Defendant Bluestem Brands, Inc.*

17 **IT IS SO ORDERED.**

18
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UNITED STATES MAGISTRATE JUDGE

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21 DATED: 6/20/2017